

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED: _____
THOMAS M. BROWN : VIOLATION: 18 U.S.C. § 1711
(Misappropriation of postal
funds - 35 counts)

INFORMATION

COUNT 1

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. Defendant Thomas M. Brown was employed by the United States Postal Service as the Postmaster of Gladwyne, Pennsylvania.
2. On or about October 27, 1999, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$100, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 2

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. On or about November 6, 1999, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$240, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 3

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. On or about November 12, 1999, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$300, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 4

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.

2. On or about November 29, 1999, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$500, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 5

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.

2. On or about December 16, 1999, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$500, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 6

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.

2. On or about January 28, 2000, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$500, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 7

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.

2. On or about February 7, 2000, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$59, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 8

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.

2. On or about March 17, 2000, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$400, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 9

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.

2. On or about April 13, 2000, at the Gladwyne Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$281, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 10

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. On or about May 1, 2000, at the Gladwyne Post Office, in the Eastern

District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$200, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 11

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. On or about May 9, 2000, at the Gladwyne Post Office, in the Eastern

District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$200, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 12

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. On or about May 11, 2000, at the Gladwyne Post Office, in the Eastern

District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Postmaster of Gladwyne, Pennsylvania, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$80, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 13

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. In or about May 2000, Brown was assigned to serve as the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office.
3. On or about June 16, 2000, at the Fort Washington, Pennsylvania, Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$400, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 14

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about August 25, 2000, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$700, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 15

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about September 11, 2000, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$500, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 16

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about October 16, 2000, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$200, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 17

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about November 10, 2000, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$210, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 18

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about November 15, 2000, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$292, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 19

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about November 22, 2000, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$150, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 20

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about December 2, 2000, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$264, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 21

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about February 22, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$215, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 22

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about March 9, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$169, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 23

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about April 23, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property in excess of \$1,000, that is, approximately \$2,090, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 24

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about April 30, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$475, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 25

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about August May 22, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$500, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 26

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about August 13, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$300, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 27

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about August 24, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$600, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 28

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about August 29, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$700, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 29

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about September 12, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$500, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 30

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about September 27, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$351, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 31

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about October 15, 2001, at the Fort Washington, Pennsylvania, Post

Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$300, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 32

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about November 5, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$270, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 33

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about November 20, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$293, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 34

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about December 10, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$491, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

COUNT 35

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count 1 is realleged herein.
2. Paragraph 2 of Count 13 is realleged herein.
3. On or about December 17, 2001, at the Fort Washington, Pennsylvania,

Post Office, in the Eastern District of Pennsylvania, the defendant

THOMAS M. BROWN,

being a Postal Service employee, that is, the Officer-in-Charge of the Fort Washington, Pennsylvania, Post Office, knowingly and unlawfully used and converted to his own use money or property, that is, approximately \$250, which had come into his hands and under his control in the execution and under color of his office, employment, and service.

In violation of Title 18, United States Code, Section 1711.

PATRICK L MEEHAN
United States Attorney